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Counsel to the Debtor

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

INTERNATIONAL LONGSHORE
AND WAREHOUSE UNION,

Debtor.

Case No. 23-30662-HLB

Chapter 11

**DECLARATION IN SUPPORT OF
EMPLOYMENT OF HAILE GIRMA & CO.
AS PROFESSIONAL UTILIZED IN THE
ORDINARY COURSE OF BUSINESS**

I, Haile Girma, pursuant to 28 U.S.C. § 1746, declare that the following is true to the best of my knowledge, information, and belief:

1. I am a owner of Haile Girma & Co., located at 4900 Shattuck Avenue, #22720, Oakland, CA 94609 (the "Firm"), which has been employed by the debtor and debtor in possession (the "Debtor") in the above-captioned case (the "Chapter 11 Case") in the ordinary course of the Debtor's business. The Debtor wishes to retain the Firm to continue providing ordinary course services during the Chapter 11 Case, and the Firm has consented to provide such services. This declaration is submitted in compliance with the *Order Approving Debtor's Motion for Entry of Order (I) Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief* (the "Ordinary Course Professionals Order").

2. The Firm may have performed services in the past, may currently perform services, and may perform services in the future in matters unrelated to the Chapter 11 Case for persons that are parties in interest in the Chapter 11 Case. The Firm does not perform services for any such person in connection with the Chapter 11 Case or have any relationship with any such person, their attorneys, or their accountants that would be adverse to the Debtor or its estate.

1 3. The Debtor has requested that the Firm provide audit services to the Debtor, and the
2 Firm has consented to provide such services.

3 4. The Firm has provided services to the Debtor prior to the commencement of the
4 Chapter 11 Case.

5 5. As part of its customary practice, the Firm is retained in cases, proceedings, and
6 transactions involving many different parties, some of whom may represent or be employed by the
7 Debtor, claimants, and parties in interest in the Chapter 11 Case.

8 6. Neither I nor any principal, partner, director, or officer of, or professional employed
9 by, the Firm has agreed to share or will share any portion of the compensation to be received from
10 the Debtor with any other person other than the principal and regular employees of the Firm.

11 7. Neither I nor any principal, partner, director, or officer of, or professional employed
12 by, the Firm, insofar as I have been able to ascertain, holds or represents any interest adverse to the
13 Debtor or its estate with respect to the matter(s) upon which the Firm is to be employed.

14 8. The Debtor owes the Firm \$0 for fees and expenses incurred prior to the date the
15 Chapter 11 Case was commenced (the "Petition Date"), the payment of which is subject to the
16 limitations contained in the Bankruptcy Code and any orders of the Court.

17 9. As of the Petition Date, the Firm held a prepetition retainer of \$ 29,000.

18 10. As of the Petition Date, the Firm was not party to an agreement for indemnification
19 with the Debtor.

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1 11. The Firm is conducting further inquiries regarding its retention by any creditors of the
2 Debtor, and upon conclusion of such inquiries, or at any time during the period of its employment, if
3 the Firm should discover any facts bearing on the matters described herein, the Firm will supplement
4 the information contained in this Declaration.

5 I declare under penalty of perjury under the laws of the United States of America that the
6 foregoing is true and correct.

7 Dated: 11/20/23



Haile Girma
Owner
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